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*Attorneys for Plaintiff David Beasley*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

DAVID BEASLEY,

Plaintiff,

v.

WILLIAM H. HOWARD,

Defendant.

Civil Action No. 1:19-cv-11058-NLH-KMW

**CERTIFICATION OF HENRY  
GABATHULER IN SUPPORT OF  
MOTION FOR *PRO HAC VICE*  
ADMISSION OF JOHN L. WELCH AND  
MARTIN B. SCHWIMMER**

*Filed Electronically*

I, Henry Gabathuler, do hereby certify that:

1. I am an attorney licensed to practice in the state of New Jersey and a Partner at the law firm of Leason Ellis LLP, which represents Plaintiff David Beasley in the above-referenced action.

2. I submit this certification in support of the applications for the *pro hac vice* admission of John L. Welch and Martin B. Schwimmer as counsel for Plaintiff David Beasley in this matter pursuant to Local Civil Rule 101.1(c).

3. John L. Welch is a shareholder of the firm Wolf, Greenfield & Sacks, P.C. Attorney Welch is a member in good standing of the Bars listed on his accompanying Certification. As stated, his is currently suspended from the Bar of the State of New York for non-payment of dues. His qualifications are set forth in his Certification filed simultaneously with these papers.

4. Martin B. Schwimmer is a Partner of the firm Leason Ellis LLP. Attorney Schwimmer is a member in good standing of the Bars to which he is admitted, and his qualifications are set forth in his Certification filed simultaneously with these papers.

5. I am a member in good standing with the Bar of the State of New Jersey and the Bar of this Court, and I move for admission *pro hac vice* of Attorneys Welch and Schwimmer on behalf of Plaintiff David Beasley in accordance with L. Civ. R. 101.1(c).

7. I am confident that John L. Welch and Martin B. Schwimmer are fully conversant with the Local Civil Rules of the United States District Court for the District of New Jersey, and they have advised me that they will abide by those Rules. I have agreed to work with John L. Welch and Martin B. Schwimmer in this action.

8. I agree to be held responsible for the filing of all pleadings, briefs and other papers filed with the Court and to have such papers signed by me or another attorney with Leason Ellis LLP authorized to practice law in the state of New Jersey. I further agree to be held responsible for the conduct of my specially admitted colleagues and will ensure that John L. Welch and Martin B. Schwimmer will comply with Local Rule 101.1(c) should this application be granted.

9. I further agree that I, or another attorney with Leason Ellis LLP authorized to practice law in the state of New Jersey, will continue to make all court appearances unless otherwise excused by the Court.

10. Defendant, through counsel, has consented to the pro hac vice admission of John L. Welch and Martin B. Schwimmer.

11. For the foregoing reasons, it is respectfully requested that the Court enter an Order admitting John L. Welch and Martin B. Schwimmer to appear pro hac vice before this Court for all further proceedings in this case.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Date: December 8, 2021

s/ 

Henry Gabathuler (HG6543)

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